Remarks

In furtherance of the Request for Continued Examination filed herewith, Applicant respectfully requests reconsideration of this Application and consideration of the foregoing amendment, which is hereby submitted in accordance with 37 C.F.R. § 1.114.

Upon entry of the foregoing amendment, claims 1-21 are pending in the application, with 1, 6, and 15 being the independent claims. Claims 1, 3-5, 7, 10, and 17 are sought to be amended to better reflect an embodiment(s) of Applicant's invention or to correct typographical errors. Support for these changes can be found, inter alia, in lines 19-21 on page 8 of the Specification, and FIG. 3 of the Drawings. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Allowable Subject Matter

In the Advisory Action, the Examiner sustains the allowance of claims 6-21. (Paper No. 14, page 1). Applicant appreciates the Examiner's allowance of these claims. As discussed above, claims 7, 10, and 17 are sought to be amended to correct typographical errors. Applicant does not believe that the proposed changes affect the Examiner's reasons for allowance.

Rejections under 35 U.S.C. § 102

In the Advisory Action, the Examiner sustains the rejection of claims 1, 2, 4, and

5 under 35 U.S.C. § 102(a), as allegedly being anticipated by U.S. Patent 6,446,192 to

Narasimhan *et al.* (herein referred to as "Narasimhan"). (Paper No. 14, page 1).

Applicant respectfully traverses.

For the Examiner's convenience, independent claim 1 is reproduced below:

> 1. A system for providing a client with access to remote
> graphics rendering resources at a server, *the server comprising*:
>
> a *graphics application, at the server*, wherein said graphics
> application receives commands from the client; and
>
> a *remote rendering control system, at the server, that
> receives graphics from said graphics application*, generates
> modified graphics instructions on the basis of said graphics
> instructions, and outputs said modified graphics instructions to said
> remote graphics rendering resources.

As presented in an Amendment and Reply filed on November 13, 2003,

Narasimhan does not disclose Applicant's invention, as recited in independent claim 1,

as previously presented or currently amended. For example, Narasimhan does not

disclose a "server comprising...a remote rendering control system, at the server, that

receives graphics instructions from [a] graphics application [at the server]." On the

contrary, Narasimhan describes a "Java applet...[that provides] the user of the client

[with the ability] to remotely monitor and/or control the remote equipment...the

compiled applet is then programmed into the network interface chip memory...[and]

upon connection, the device's applet is downloaded into the client's JVM and renders the

control panel on the client's screen." (See col. 9, lines 1-13). Therefore, Narasimhan's

Java applet is executed at the client-side, and renders a "control panel" on the client's

screen. No other discussion of "rendering" can be found in Narasimhan. In other words,

neither Narasimhan's Java applet nor its network interface control chip comprises "a

remote rendering control system, at the server, that receives graphics instructions from

[a] graphics application [at a server]."

To support his rejections, the Examiner argues that Narasimhan's:

> network interface chip acts as the server running or executing Java,
> which it supports and the remote device acts as the client running
> Java Applets. While it is true that the Java Applets execute on the
> remote client's JVM, the server side (network interface chip) of the
> client-server communications and data exchange runs and executes
> *applications to support the two-way communication*. For
> example in col. 6, ln. 30 - col. 7, ln. 30, lists many applications and
> protocols employed by the network interface chip (server side); i.e.
> standard TCP/IP, DLL, HTTP, SMTP, PPP, UDP, HTML, FTP
> and of course Java.

> Furthermore using standard internet protocols (TCP/IP, DLL,
> HTTP, SMTP, PPP, UDP, HTML, FTP) communication between
> the server side (network interface chip) and client (remote) as
> exemplified in col. 9, lns. 21 - col., ln 54.

> Further still is employing an API (application program
> interface) on the network interface chip (server) as exemplified in
> brief in col. 11, lns 3-9. (Paper No. 11, page 5, <u>emphasis</u> added).

Hence, the Examiner admits that Narasimhan's Java applet is not "a graphics

application at a server", but insists that Narasimhan's network interface control chip

includes "applications to support the two-way communication" with the client-side

applet. Even if the Examiner's assertions were true (which Applicant does not concede),

Narasimhan does not describe that "a remote rendering control system" communicates

with these alleged "applications." Moreover, Narasimhan does not describe that "a

remote rendering control system…receives graphics instructions" from the alleged

"applications." The above list of transfer protocols (e.g., TCP/IP, DLL, HTTP, SMTP,

PPP, UDP, HTML, FTP, etc.) also does not describe "a remote rendering control system,

at the server, that receives graphics instructions from [a] graphics application [at a

server]." As discussed above, Narasimhan does not describe "rendering" at any location other than at the client, where only a control panel is being rendered.

Therefore, Applicant respectfully submits that Narasimhan does not disclose Applicants' invention as recited in independent claim 1. Dependent claims 2-5 depend from claim 1, and therefore, are patentable over Narasimhan for at least the reasons stated above, in addition to the features recited therein. Applicant respectfully requests reconsideration and withdrawal of the Examiner's rejection of the aforesaid claims, and allowance thereof.

Rejections under 35 U.S.C. § 103

In the Advisory Action, the Examiner sustains the rejection of claim 3 under 35 U.S.C. § 103, as allegedly being anticipated by Narasimhan in view of U.S. Patent 6,085,247 to Parsons, Jr. *et al.* (herein referred to as "Parsons"). (Paper No. 14, page 1). Applicant respectfully traverses.

Narasimhan and Parsons, taken alone or in combination, do not teach or suggest Applicant's invention, as recited in claim 3. Claim 3 depends from independent claim 1, and therefore, is patentable over Narasimhan for at least the reasons stated above. For example, Narasimhan does not teach or suggest a "server comprising...a remote rendering control system that receives graphics instructions from [a] graphics application [at the server]."

Parsons fails to cure the defects of Narasimhan since it also does not teach or suggest a "server comprising...a remote rendering control system that receives graphics instructions from [a] graphics application [at the server]." As such, Applicant

respectfully requests reconsideration and withdrawal of the Examiner's rejection of the

aforesaid claims, and allowance thereof.

Other Considerations

In the Advisory Action (Paper No. 14, page 2), the Examiner makes of record,

but does not apply, two documents, namely:

> (a) "Distributed Rendering for Scalable Displays," by Greg Humphreys *et al.*, available online at URL:http://www.graphics.stanford.-edu/papers/clust_render.pdf; and

> (b) "ATM LAN End User Hosts," available online at URL:http://-www.scd.ucar.edu/nets/docs/archives/ATM-strategy.

Although these documents have not been cited against the Applicant, it should be

noted that neither of these documents teach nor suggest "a ***graphics application, at the***

server,... [that] receives commands from [a] client" or "a remote rendering control

system, at the server, that receives graphics instructions from said graphics application,

generates modified graphics instructions on the basis of said graphics instructions, and

outputs said modified graphics instructions to the remote graphics rendering resources."

Therefore, Applicant respectfully requests reconsideration and allowance of claims 1-5.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed,

accommodated, or rendered moot. Applicant therefore respectfully requests that the

Examiner reconsider all presently outstanding objections and rejections and that they be

withdrawn. Applicant believes that a full and complete reply has been made to the

outstanding Office Action and, as such, the present application is in condition for

allowance. If the Examiner believes, for any reason, that personal communication will

expedite prosecution of this application, the Examiner is invited to telephone the

undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully

requested.

Respectfully submitted,

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